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**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA**

ANIBAL RODRIGUEZ, SAL CATALDO,  
 JULIAN SANTIAGO, and SUSAN LYNN  
 HARVEY, individually and on behalf of all  
 others similarly situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

Case No.: 3:20-cv-04688

**[PROPOSED] ORDER GRANTING  
 PLAINTIFFS' MOTION FOR RELIEF  
 FROM CASE MANAGEMENT  
 SCHEDULE**

The Honorable Richard Seeborg

**[PROPOSED] ORDER**

Before the Court is Plaintiffs' Rule 16 motion for relief from the case management schedule. The Court has "extensive flexibility" to modify deadlines, "whether the enlargement is sought before or after the actual termination of the allotted time." *Lujan v. Nat'l Wildlife Fed.*, 497 U.S. 871, 906 n.7 (1990) (quotation marks and citation omitted). Under Rule 16 of the Federal Rules of Civil Procedure, case schedules may be modified "for good cause and with the judge's consent." *Fishon v. Premier Nutrition Corp.*, 2022 WL 958378, \*1 n.1 (N.D. Cal. Mar. 30, 2022) (Seeborg, J.) (quoting Fed. R. Civ. P. 16(b)(4)); *see also In re Cathode Ray Tube (CRT) Antitrust Litig.*, 2014 WL 5462496, at \*3 (N.D. Cal. Oct. 23, 2014) (noting that scheduling orders may be modified for good cause and extending an extension of discovery to "permit document discovery and depositions to go forward"). Plaintiffs have shown good cause for their proposed extension.

The Court hereby **GRANTS** Plaintiffs' motion for relief and sets the following dates and deadlines for further proceedings:

<u>Event</u>	<u>Current Deadline (Dkt. 246)</u>	<u>Plaintiffs' Proposed Deadline</u>
Initial Expert Witness Disclosures:	January 20, 2023	March 20, 2023
Rebuttal Expert Witness Disclosures:	May 1, 2023	June 30, 2023
Close of Expert Discovery:	June 2, 2023	July 31, 2023
Motion for Class Certification:	June 9, 2023	August 7, 2023
Opposition to Class Certification:	July 14, 2023	September 11, 2023
Reply in Support of Class Certification:	August 10, 2023	October 9, 2023
Hearing on Class Certification:	August 24, 2023 at 1:30 PM	TBD

**IT IS SO ORDERED.**

DATED: \_\_\_\_\_

Honorable Richard Seeborg  
Chief United States District Judge